

1 HARMEET K. DHILLON
Assistant Attorney General
2 MICHAEL E. GATES
Deputy Assistant Attorney General
3 CARRIE PAGNUCCO
Chief, Housing and Civil Enforcement Section
4 AMIE S. MURPHY (NYRN 4147401)
Deputy Chief, Housing and Civil Enforcement Section
5 CHARLOTTE LANVERS (CABN 257814)
Trial Attorney, Housing and Civil Enforcement Section
6 Civil Rights Division
U.S. Department of Justice
7 950 Pennsylvania Avenue NW – 4CON
Washington, DC 20530
8 Tel.: (202) 5305-5703
Fax: (202) 514-1116
9 Email: Charlotte.Lanvers@usdoj.gov

10 Attorneys for Plaintiff, United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 FATHI ABDULRAHIM HARARA AND
18 NATIVE GROUNDS, LLC, d/b/a
JERUSALEM COFFEE HOUSE,

19 Defendants.

CASE NO. 3:25-CV-04849-SI

**STIPULATION TO STAY CASE;
DECLARATION; [PROPOSED] ORDER**

1 Subject to the Court's approval, Plaintiff and Defendants, through their undersigned counsel of
2 record, hereby stipulate as follows:

3 1. At midnight on September 30, 2025, the appropriations act that had been funding the
4 Department of Justice expired and appropriations to the Department lapsed. The date when
5 funding will be restored by Congress has not been established.

6 2. Plaintiff has conveyed the following to Defendant:

7 a. An officer or employee of the United States who violates 31 U.S.C. § 1341(a)
8 (obligate/pend in excess or advance of appropriation), § 1342 (voluntary services
9 prohibition), or § 1517(a) (obligate/pend in excess of an apportionment or
10 administrative subdivision as specified in an agency's regulations) "**shall** be subject
11 to appropriate administrative discipline including, when circumstances warrant,
12 suspension from duty without pay or removal from office." 31 U.S.C. §§ 1349(a),
13 1518 (emphasis added). Accordingly, each United States Attorney has been
14 instructed to designate those attorneys and support staff whose work is necessary to
15 sustain legal operations essential to the safety of human life and the protection of
16 property.

17 b. The undersigned counsel is furloughed and is not permitted to work on the instant
18 case during the lapse in appropriations.

19 3. The parties therefore request a stay of this case for either: 30 days or when Congress has
20 restored appropriations to the Department of Justice and the government shutdown ends,
21 whichever occurs first. The parties further request that all deadlines, including currently
22 scheduled hearing dates, in this case be extended for a period commensurate with the
23 duration of the lapse in appropriations – *i.e.*, each deadline would be extended by the total
24 number of days of the lapse in appropriations.

25 4. If this stay is granted, the stay will end 30 days from the date the stay was granted or, if the
26 government shutdown ends in less than 30 days, counsel for the United States will promptly
27 notify the Court as soon as the government shutdown has ended and confer with opposing
28 counsel and submit within two weeks a revised joint proposed schedule, including

rescheduling the parties' case management conference currently scheduled for November 14, 2025.

IT IS SO STIPULATED.

Dated: October 31, 2025

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

CARRIE PAGNUCCO
Chief, Housing and Civil Enforcement
Section

AMIE S. MURPHY
Deputy Chief, Housing and Civil
Enforcement Section

WALTER RILEY
LAW OFFICE OF WALTER RILEY
1407 Webster Street, Suite 206
Oakland, CA 94612
walterriley@rrrandw.com
(510) 451-1422

s/ Glenn Katon
GLENN KATON
KATON.LAW
385 Grand Avenue, Suite 200
Oakland, CA 94610
(510) 463-3350
gkaton@katon.law

s/ Charlotte Lanvers
CHARLOTTE LANVERS
Trial Attorney
United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
T: (202) 305-5703
charlotte.lanvers@usdoj.gov

Attorneys for Defendants

Attorneys for Plaintiff

ECF ATTESTATION

In accordance with Civil Local Rule 5(i)(3), I, Charlotte Lanvers, attest that I have obtained concurrence in the filing of this document from all other signatories listed here.

DECLARATION OF CHARLOTTE LANVERS

I, Charlotte Lanvers, declare and state as follows:

1. I am a Trial Attorney with the Civil Rights Division of the United States Department of Justice. I have personal knowledge of the matters set forth below, except those matters that are based on information and belief, which I believe to be true, and could and would testify competently to them if called to do so. I make this declaration in support of the parties' Stipulation to Stay Case, filed concurrently herewith.
2. I am furloughed and I am not permitted to work on the instant case during the lapse in appropriations.
3. On October 29, 2025, I contacted Defendant's counsel regarding this requested stay. Defendants' counsel graciously agreed to Plaintiff's request for a stay.
4. This request may have the effect of staying the Case Management Conference set for November 14th.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 31, 2025

/s/ Charlotte Lanvers

Charlotte Lanvers

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED.

1. This case is stayed until Congress restores appropriations to the Department of Justice and the government shutdown ends. All deadlines, including currently scheduled hearing dates, in this case be extended for a period commensurate with the duration of the lapse in appropriations – *i.e.*, each deadline would be extended by the total number of days of the lapse in appropriations.
2. Counsel for the United States will promptly notify the Court as soon as the government shutdown has ended and confer with opposing counsel and submit within two weeks a joint proposed schedule for the remainder of litigation, including a proposed date to reschedule the Case Management Conference currently set for November 14th.

DATED: _____

HON. Susan Illston
Senior U.S. District Judge